

February 3, 2003

Mr. William G. Pennington  
California Energy Commission  
1516 Ninth Street  
Sacramento, CA 95814-5512

Subject: 2005 Energy Efficiency Standards – Residential Lighting

Dear Bill:

Lithonia Lighting is the largest manufacturer of lighting equipment in North America and is committed to providing high quality energy efficient lighting products for the residential market.

The proposed requirement for 50% of the installed wattage in kitchens to meet higher efficiency levels is a reasonable and effective requirement. Lithonia Lighting has provided fluorescent products that can meet this requirement for over 20 years. These products are proven to be reliable, designed to meet homeowners' aesthetic requirements and are cost effective over the life of the system. The 50% requirement is flexible, by allowing the builder to incorporate less efficient lighting when necessary. We believe this measure is required for California to achieve the necessary reductions in energy demand.

As you are aware, Lithonia Lighting has partnered with Lawrence Berkeley National Laboratories and Sacramento Municipal Utility District to develop a highly energy efficient and cost-effective kitchen lighting system. This system is designed with close collaboration from the builder community to utilize proven lighting components that integrate together into a builder friendly system. We expect that the purchase cost of this system to be less than an installation utilizing traditional compact fluorescent (CFL) recessed cans. While the purchase cost will be slightly higher than incandescent systems, builders can expect to realize savings resulting from a system that reduces installation time.

This PIER funded project has been designed to deliver a system with the following performance attributes:

- Energy efficient. A kitchen can be designed using about one third of the total energy required for an incandescent recessed can system. A kitchen using 4 recessed incandescent cans will realize an annual savings of about 550 kWh per year.
- Ensures sustainable energy savings. Because of the pin-based sockets in the CFL recessed can, the lamp cannot be switched out to an inefficient source at a later time. This ensures that the state of California will maintain the expected energy savings from this system.
- Cooler operation and increased reliability. Because of the design of this system, the ballast and lamps will operate cooler. This results in a system that has improved lamp performance and increased ballast life.

A key driver to Lithonia's commitment to this project is based on an increased demand for CFL recessed can systems supported by Title 24 requirements. Assuming no substantive changes are made to the lighting section of Title 24, we expect our product will be commercially available in California long before 2005 when the new code goes into effect. We believe a weakening of the code requirements will reduce the demand for energy efficient residential lighting. If this results, it may cause our company to reevaluate our strategies with respect to developing new lighting products focused on higher levels of energy efficiency.

The proposed Title 24 residential lighting requirements provide for builder and consumer flexibility yet offer a substantial savings in residential energy consumption. The proposed requirement is based on products readily available in the marketplace today and encourages even more efficient products in the future. We strongly support the implementation of the proposed measures as currently drafted.

Thank you for your time and consideration of these comments.

Best regards,

A handwritten signature in black ink that reads "Cheryl R. English". The signature is written in a cursive, flowing style.

Cheryl English  
Vice President, Technical Marketing Services